

REMARKS

Claim 1 and other claims stand rejected under 35 U.S.C. §102(e) as being fully anticipated by U.S. Pat. No. 6,609,050 (Li).

Li is of Limited Relevance.

Li is directed to a computer-based warranty administration system. See Abstract of Li. This reference expressly purports to overcome shortcomings associated with prior write-up processes for administering vehicle warranty and repair, such as the collection of information by a service associate from a consumer. Aspects of the write-up may involve initial repair order by the service associate, dispatching the work to a technician, communicating progress back to the customer. See Li, col. 1, lines 30-61. In contrast to applicant's claimed invention, Li's system does not make any provisions for storing training modules in a database for training service personnel to service selected equipment, much less for identifying and then communicating any needed training modules from the database to an input/output device, as set forth in claim 1. Thus, nowhere does Li teach or suggest the claimed computerized method for training service personnel to service selected equipment while the service personnel is on-site adjacent the equipment to perform a service for which the service personnel may not yet be qualified to perform.

Li Fails to Teach or Suggest Elements and/or Operational Relationships recited in Claim 1.

The last Office Action paraphrases elements and/or operational relationships set forth in claim 1 and then cites passages from Li that purportedly teach or suggest the claimed elements and/or relationships, however, upon close scrutiny, the cited passages of Li in fact fall short of the statutorily required teaching or suggestion.

A. Claim 1 requires "a database for storing training modules for training service personnel to service respective assemblies of selected equipment." However, the citation to Li's FIG. 4, col. 4, line 56-67, and col. 5, line 1-5 does not provide any such teaching or suggestion. Rather this passage of Li is merely directed to a vehicle owner database 93 and just lists information such as vehicle ID, vehicle warranty type,

vehicle date information and vehicle maintenance data. Nowhere from the reading and showing of the foregoing passage can one conclude that the vehicle owner database 93 is used for storing training modules for training service personnel to service respective assemblies of selected equipment. Similarly, the Office Action cites Li's col. 4, line 56-67 and col. 5, line 1-5, but this passage of Li in fact describes a user skill determinator module 50 for determining a skill level for the user. It appears that the skill level information may be stored in a service dealer database 94 (FIG. 3). However, such user skill determinator module and service dealer database do not teach or suggest storing training modules for training service personnel to service respective assemblies of selected equipment. In fact none of the information that is stored in any of the databases of Li, as shown in FIGS. 1-6 and described in the specification of Li, constitutes training modules for training service personnel to service respective assemblies of selected equipment. Thus, it is respectfully asserted that on this basis alone Li fails to anticipate or suggest claim 1. However, applicant proceeds below to describe two alternative reasons as to why the underpinnings of the rejection are flawed.

B. Claim 1, as amended, further requires "in the event the predefined qualifications for servicing the assemble are unmet by the present qualification of the service provider, identifying one or more needed training modules in the database for storing training modules that upon completion by the service personnel would enable the service personnel to meet the predefined qualifications relative to that assembly." However, the passages and drawing figure of Li cited in the Office Action (i.e., Li's FIG. 3, col. 3, line 23-31, and col. 4, line 26-29) do not teach or suggest the foregoing operational relationship. FIG. 3 of Li shows a repair processing module 40 that includes a warranty analysis module 41, a service dealer selector module 42, a scheduler module 43, a technician selector module 44 and a vehicle loan module 45, none of these modules performs any action of identifying one or more needed training modules (in the imaginary database of Li that stores the training modules) that upon completion by the service personnel would enable the service personnel to meet the predefined qualifications relative to that assembly. It is respectfully noted that the straightforward amendment in claim 1 does not introduce any new issues and is just made to explicitly

recite implicit aspects of the invention and, consequently, applicant respectfully requests that this amendment be entered.

C. Claim 1 further requires "communicating the needed training modules from the database to the input/output device for access by the service personnel set to perform the service, thereby enabling that service personnel to be trained to become qualified to complete the servicing task with the service personnel remaining on-site." The Office Action indicates that col. 7 lines 42-54 and col. 4, lines 38-40 and lines 46-53 teach this feature. However, a fair reading of these passages indicates that Li does not include any such teaching or suggestion, but rather Li at col. 7 lines 42-54 just teaches that a service associate (i.e., the service advisor) can use a user interface to indicate type of damage and damage location on the vehicle. This has nothing to do with communicating training modules to service personnel set to perform the service. Similarly, col. 4 lines 38-40 and col. 4 lines 46-53, appear to describe details regarding the service dealer database 94 and a technician selector module 44. However, such a technician selector module 44 does not teach or suggest any communicating of training modules that may be needed by the technician to overcome repair skill deficiencies while the technician remains on-site. Li recognizes that his system is not designed to deliver any training modules to technicians when Li's system recommends that the technician be sent to a training program to learn additional repair skills. Thus, in contrast to Claim 1, Li does not deliver a training program to the technician, but rather the technician has to be sent to a training program beyond the reach of system 10. See Li, column 3, lines 29 through 30. This is very different and inapposite to the operational relationships recited in claim 1 where the service personnel will receive essentially on real time basis the needed training modules from the database without having to disengage from the servicing activity, and enroll in and attend a training program, which likely requires that the service personnel travel to another location. These activities could represent a significant delay and cost not only in terms of lost personnel time, but also lost equipment availability for return to service. Li appears to teach away from these aspects of the present invention in that Li merely recommends what is conventionally done when someone lacks a skill. Go back to school! The present invention metaphorically speaking brings the school on the spot to the

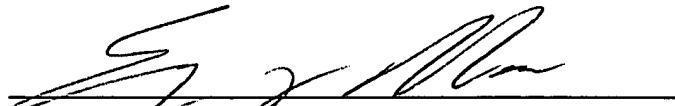
technician so that the technician can fulfill the servicing task. Applicant cannot unduly overemphasize that this is a key advantage of the present invention that is simply not taught or suggested by Li.

In view of the foregoing remarks, it is respectfully submitted that Li fails to teach any of the above-noted operational relationships (items A, B or C) recited in claim 1, and consequently does not and cannot anticipate claim 1 under the statutory standards of § 102. Since each of claims 2-15 that depend from claim 1 includes the structural and/or operational relationships respectively recited in such independent claim 1, it is also respectfully submitted that Li also fails to anticipate each of such dependent claims.

Claim 16 is directed to a computerized system for training service personnel. In part, claim 16 recites a training identifier (not a technician identifier) configured to identify one or more training modules that may be communicated to service personnel with an input/output device to meet predefined qualifications for servicing a given assembly while remaining on-site. It is respectfully submitted that Li does not anticipate independent apparatus claim 16 since Li fails to teach or suggest the structural and/or operational relationships respectively recited in claim 16.

It is respectfully submitted that each of the claims pending in this application recites patentable subject matter and it is further submitted that such claims comply with all statutory requirements and thus each of such claims should be allowed.

Respectfully submitted,



Enrique J. Mora, Esquire
Registration No. 36,875
Beusse, Brownlee, Wolter, Mora & Maire, P.A.
390 North Orange Avenue, Suite 2500
Orlando, Florida 32801
Telephone: (407) 926-7705
Facsimile: (407) 926-7720



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Grayce A. Lichtenberger
Grayce A. Lichtenberger

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